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Attorneys for Oluremi Akinleye

United States District Court

District of Nevada

United States of America,

Plaintiff,

v.

Oluremi Akinleye,

Defendant.

Case No. 2:20-CR-00217-GMN-EJY

**UNOPPOSED MOTION FOR
RELEASE OF PASSPORT TO
DEFENDANT AKINLEYE'S
FAMILY**

Memorandum of Points and Authorities

The defendant, Oluremi Akinleye, by and through his attorney of record, Russell E. Marsh, Esq., and Sunethra Muralidhara, Esq., of Wright Marsh & Levy, submits this unopposed motion for release of Defendant Akinleye's United States Passport, United States Passport Card, and Nigerian Passport, to his wife, Nikkeye Akinleye. Said property remains in the possession and safekeeping of his defense counsel.

On June 29, 2022, Mr. Akinleye appeared in Court and entered a guilty plea to Counts One, Eight, and Nine of the Indictment, which charged the defendant with Conspiracy to Commit Wire Fraud under 18 U.S.C. § 1349 (Count One), Possession of 15 or More Counterfeit

1 and Unauthorized Access Devices under 18 U.S.C. § 1029(a)(3) (Count Eight), and Aggravated
 2 Identity Theft under 18 U.S.C. § 1028A(a)(1) (Count Nine). ECF 33. On November 28, 2023,
 3 this Court sentenced defendant to a total sentence of 45 months. ECF 45, 46. Mr. Akinleye
 4 self-surrendered on or about February 27, 2023 and remains in federal custody.

5 After Mr. Akinleye's sentencing, the parties were in discussion about returning non-
 6 forfeited property. In June 2023, defense counsel met with the case agent on the case to accept
 7 the return of property for safe-keeping. Among the many returned items included Mr.
 8 Akinleye's United States Passport, United States passport card, and Nigerian passport. While
 9 all other property has been returned to Mr. Akinleye's wife, the United States Passport, United
 10 States passport card, and Nigerian passport remain in defense counsels' possession and safe-
 11 keeping. After consultation with AUSA Jim Fang, this unopposed motion is being filed
 12 requesting the Court's approval for return of these items to Mr. Akinleye's wife. Mr. Akinleye
 13 has given counsel permission to release said items to her since he remains in federal custody.
 14 With the Court's permission, counsel would like to release said property to Mrs. Akinleye.

15 DATED June 13, 2023.

16 WRIGHT MARSH & LEVY

17 By: /s/ Sunethra Muralidhara

18 Russell E. Marsh

19 Sunethra Muralidhara

20 Attorneys for Oluremi Akinleye

21 IT IS SO ORDERED: 

22 Dated: June 26, 2023

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of Wright Marsh & Levy and is a person of such age and discretion as to be competent to serve papers. That on June 13, 2023 she served the above-entitled document either via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list, emailed, hand delivered, facsimile, or placed in the United States mail, postage prepaid, to the following persons at their last known address:

Jason M. Frierson
United States Attorney District of Nevada
Jim Fang
Assistant United States Attorney
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101

/s/ Debbie Caroselli
Employee Wright Marsh & Levy